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Attorneys for Defendants
Create Music Group, Inc., The Nation, LLC,
Lowly Palace, LLC, and CBMG, LLC

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

ARTIST PUBLISHING GROUP, LLC, a
Delaware limited liability company;
ARTIST PARTNER GROUP, INC., a
Delaware corporation; and RELEASE
GLOBAL, LLC, a California limited
liability company,

Plaintiffs,

v.

CREATE MUSIC GROUP, INC., a
Delaware corporation; THE NATION,
LLC, a Delaware limited liability
Company, sometimes d/b/a Broke
Records; LOWLY PALACE, LLC, a
Delaware limited liability company, and
CBMG, LLC, a Delaware limited
liability company,

Defendants.

CASE NO. 2:25-CV-00509

**JOINT STIPULATION OF
DISMISSAL (FRCP 41(a)(1))**

Judge: Hon. R. Gary Klausner

Action filed: January 21, 2025

Complaint filed: January 23, 2025
FAC filed: April 8, 2025

**TO THE CLERK OF THE COURT AND TO ALL PARTIES AND THEIR
ATTORNEYS OF RECORD:**

Plaintiffs ARTIST PUBLISHING GROUP, LLC, ARTIST PARTNER GROUP, INC., and RELEASE GLOBAL, LLC (collectively, “Plaintiffs”), and Defendants CREATE MUSIC GROUP, INC., THE NATION, LLC, LOWLY PALACE, LLC, and CBMG, LLC (collectively, “Defendants”) (hereinafter collectively, the “Parties”), by and through their respective counsel of record, stipulate as follows:

1. On January 21, 2025, Plaintiffs filed the Initial Complaint in the above-captioned action in the United States District Court for the Central District of California. The Initial Complaint named as defendants all of the Defendants other than CBMG, LLC.

2. On or about January 23, 2025, Plaintiffs served the Defendants then named.

3. On February 4, 2025, the Plaintiffs agreed to grant the Defendants then named a thirty-day extension of time to respond to the Complaint.

4. On March 14, 2025, the Defendants then named filed a Motion to Dismiss Counts I, III, and IV of Plaintiffs’ Complaint.

5. On March 20, 2025, the Parties filed a Joint Stipulation which granted Plaintiffs leave to file an amended complaint.

6. Plaintiffs filed a First Amended Complaint on April 8, 2025, which added CBMG, LLC as a defendant.

7. On April 22, 2025, Defendants filed a Motion to Dismiss Counts III, IV, and V of Plaintiffs’ First Amended Complaint.

8. The Court granted Defendants’ Motion to Dismiss in part (Dkt No. 44).

9. Defendants filed an Answer and Counterclaims against Plaintiffs on June 17, 2025 (Dkt No. 48).

10. On July 16, 2025, the Panel Mediation was conducted and the Parties reached a settlement in principle, conditioned upon entering into a formal, written settlement agreement.

11. The Parties thereafter executed a formal settlement agreement.

1 **IT IS HEREBY STIPULATED AND AGREED**, pursuant to Fed. R. Civ. Proc.
2 41(a)(1)(A)(ii), by and between the Parties hereto, Plaintiffs ARTIST PUBLISHING
3 GROUP, LLC, ARTIST PARTNER GROUP, INC., and RELEASE GLOBAL, LLC
4 hereby dismiss this action in its entirety, with prejudice, inclusive of any and all claims
5 asserted in their First Amended Complaint as to all Defendants and Counterclaim
6 Plaintiffs.

7 Defendants CREATE MUSIC GROUP, INC., THE NATION, LLC, LOWLY
8 PALACE, LLC, and CBMG, LLC hereby dismiss this action in its entirety, with
9 prejudice, inclusive of any and all claims asserted in their Counterclaim Complaint as to
10 all Plaintiffs and Counterclaim Defendants.

11 All parties are to bear their own costs associated with this action.

12 **IT IS SO STIPULATED.**

13
14 DATED: December 23, 2025

ELLIOT GIPSON PC
ELLIOT B. GIPSON
BRIANNA LOGAN

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16
17
18 By /s/ Brianna Logan
19 BRIANNA LOGAN
20 Attorneys for Defendants Create Music
21 Group, Inc., The Nation, LLC, Lowly
22 Palace, LLC, and CBMG, LLC

23
24 DATED: December 23, 2025

CHAUDHRYLAW, PLLC
Jeffrey M. Movit

25 By /s/ Jeffrey Movit
26 JEFFREY M. MOVIT
27 Attorney for Plaintiffs Artist Publishing
28 Group, LLC, Artist Partner Group, Inc., and
Release Global, LLC

SIGNATURE ATTESTATION

Pursuant to Local Rule 5-4.3.4(a)(2)(i), I, Brianna Logan, attest that all other signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

DATED: December 23, 2025

ELLIOT GIPSON PC
Elliot B. Gipson
Brianna Logan

By /s/ Brianna Logan
BRIANNA LOGAN
Attorneys for Defendants Create Music Group,
Inc., The Nation, LLC, Lowly Palace, LLC,
and CBMG, LLC